UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

--x

MUSAIB ISMAILOVYCH ISMAILOV and
AKHMED HADZHYIOVYCH BILALOV,

        Plaintiffs,

        -v-

MYKHAILO SAFARBEKOVYCH
HUTSERIEV, STANISLAV
KOSTIANTYNOVYCH KUZNETSOV, and
PUBLIC JOINT STOCK COMPANY
"SBERBANK OF RUSSIA",

        Defendants.

Case No: 1:24-cv-03287-AT

--x

DECLARATION OF DAVID SZAKONYI
IN OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS
AND THE SBERBANK DEFENDANTS' MOTION FOR SANCTIONS

I, DAVID SZAKONYI, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1.   I am a full-time Associate Professor of Political Science at The George Washington University in Washington, D.C ("GW"). There, I teach classes on Russian politics and money and influence in global politics.

2.   I am also a researcher at GW. My research focuses on corruption, clientelism, and political economy in Russia, Western Europe, and the United States. I also research the effectiveness of anti-corruption campaigns, employers' mobilizing their voters to turnout during elections, and nepotism under authoritarian rule.

3.   I received my B.A. in Political and Social Thought from the University of Virginia. I received my PhD in Political Science from Columbia University. At Columbia University, I

received multiple academic awards, including the Gabriel A. Almond Award for the best dissertation in comparative politics.

4.   I have appeared on multiple international and local television networks to discuss my research, as well as having been published in both top academic and popular media outlets.

5.   I co-founded the Anti-Corruption Data Collective, which aims to expose corruption in developed countries. The Anti-Corruption Data Collective's work has been published in numerous media outlets, including The Washington Post, Foreign Policy, The Daily Beast, and The Miami Herald.

6.   Previously, I worked as a Research Fellow at the International Center for the Study of Institutions and Development at the Higher School of Economics in Moscow, Russia.

7.   A copy of my CV, which contains further details of my professional and academic credentials   and   experience,   is   attached   hereto   as   **Exhibit   1** (https://politicalscience.columbian.gwu.edu/david-szakonyi).

8.   I do not and do not intend to waive any legal advice, litigation, or other privilege by referring to any matters in this declaration.

9.   I respectfully submit this declaration in support of Plaintiffs' opposition to: (i) the motion to dismiss of defendants Public Joint Stock Company "Sberbank of Russia" ("Sberbank") and Stanislav Kostiantynovych Kuznetsov ("Kuznetsov"; and with Sberbank, "Sberbank Defendants") (ECF 52, "Sberbank Motion to Dismiss"); (ii) the motion to dismiss of defendant Mykhailo Safarbekovych Hutseriev ("Hutseriev"; and collectively with the Sberbank Defendants, "Defendants") (ECF 79, "Hutseriev Motion to Dismiss"); and (iii) the motion for sanctions of the Sberbank Defendants (ECF 69; "Motion for Sanctions"; and collectively as to all of Defendants' motions, the "Motions").

10.   Attached hereto as **Exhibit 2** is a true and correct copy of the report I drafted discussing the relationship between the Russian Federation and Sberbank, and Russia's influence and control over Sberbank and its operations.[1]

I, DAVID SZAKONYI, declare under penalty of perjury that the foregoing is true and correct.

Executed on: 11/14/2024

_____
DAVID SZAKONYI

---

[1] My report contains footnotes that provide the source information upon which I rely. At the Court's request, I will provide the Court with this source information.